



OMB No. 2010-0032
Expiration Date 01/10/2010

Performance Track Membership Renewal Application 2008

Covanta Hempstead Company
Covanta Energy Corporation
Member since 2002

A020052

General Information

1 Facility Contact

Member Name: Covanta Hempstead Company
Member ID Number: A020052
Name of Parent Company (if any): Covanta Energy Corporation
Facility Contact: Mr. Scott Wheeler
Environmental Engineer
(516) 683-5438
swheeler@covantaenergy.com

2.a List the activities, products, or services that take place at your facility.

Covanta Hempstead is an Energy-from-Waste facility that combusts municipal solid waste for volume reduction and generates electricity that is sold to the local utility for distribution to end users. The facility is permitted to process up to 975,000 tons of waste per year, based on a 12-month rolling total. Ferrous and non-ferrous metals are recovered from the ash residue prior to disposal and recycled.

2.b Provide the size and general description of your site.

The Hempstead facility is located on a 15-acre parcel of land in a commercial / residential area. The property is bounded by a commercial strip center, an FAA air traffic control center and a highway, with a condominium complex across the street.

2.c Describe any recent changes to facility operations or ownership (if applicable).

None

Describe any activities, products, or services located on your site that are not intended to be

2.d included in the facility definition for purposes of Performance Track membership (e.g., business units, leased areas, tenants, or contractors) (if applicable).

None

Goal 1

1a Category Waste

1b Indicator Non-hazardous waste generation

Does your goal include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific substance or component (e.g., ethane, cardboard)? All measurements should represent the performance level for the indicator across the entire facility. For many indicators, however, you may choose to focus your goal on a specific subset of the indicator, e.g. a specific material, a specific group of toxic air emissions, a particular waste component, a specific VOC, etc.

Specific

If your goal is to a specific substance or component, please provide additional detail on your indicator (e.g., specific chemical to be reduced, specific waste component).

The specific waste to be reduced is ash residue generated from the combustion of municipal solid waste.

What activities or process changes do you plan to undertake at your facility to

1d accomplish your goal e.g., technology changes in a particular process line, employee training?

The facility recovers ferrous and non-ferrous metals from the ash residue prior to disposal and ships the metals off-site to be recycled. In 2008, we plan to modify the ash handling equipment to improve the efficiency of the metals recovery process, thereby reducing the amount of ash that must be disposed.

1e Describe the data collection process and data source(s) that you will use to measure progress towards this goal.

All trucks carrying ash residue are weighed prior to leaving the facility and the weights are stored in the scale system.

2a Are you proposing this as a Challenge Goal?

No

2b Does this goal address a significant aspect in your EMS?

Yes

In the table below, please enter your facility's amount of non-hazardous waste, broken down by waste management method. Please enter both the amounts that you manage currently and that you intend to manage in 2010. "Waste" is defined as all materials that are sent off-site that are neither product nor product packaging. Assume a constant level of activity at your facility when setting your future goal.

Flexible Form Needed?	No		
Is the intent of your non-hazardous waste goal to reduce non-hazardous waste, to improve methods of waste management, or a combination of both?	Improve Waste Management Methods		
3a Please provide information for these calendar years.	Baseline: 2007	Future: 2010	
3b Method of Waste Management	How much of your waste is handled using each management method?		
	Baseline	Future	Units
Exclude?	No	No	
Reason for Exclusion			
Landfill	238,266	232,266	Tons
Reused/recycled off-site	0	6,000	Tons
Total Non-Hazardous Solid Waste	238,266.00	238,266.00	Tons

4 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?

Normalized goal (i.e. indexed to level of business in baseline year)

5

Whether your goal is absolute or normalized, in your annual performance reports you will need to provide normalizing factors and normalized quantities of your annual data.

Tons of municipal solid waste (MSW) processed, which is directly proportional to the amount of ash residue generated (approx. 25% by weight)

6a Are you subject to Federal, State, Tribal, or local regulatory requirements for this indicator?

Yes

6b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you.

There are no quantitative limits on the amount of ash residue generated or disposed. However, there are specific handling, storage, and testing requirements detailed in our operating permits.

6c Your goal must exceed regulatory requirements. If applicable, explain how your goal exceeds the requirements.

Since there are no limits on the amount of ash residue generated or disposed, any decrease is a voluntary improvement that goes beyond the requirements.

Goal 2

1a Category Water Use

1b Indicator Total water used

1c Does your goal include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific substance or component (e.g., ethane, cardboard)?

All

1d What activities or process changes do you plan to undertake at your facility to accomplish your goal e.g., technology changes in a particular process line, employee training?

All process water used at the facility is drawn from on-site groundwater wells. We plan to apply to the NYS Department of Environmental Conservation (NYSDEC) for a beneficial use determination (BUD) that will allow us to accept waste water from other facilities (landfill leachate and/or industrial "grey" water) for use in our acid gas scrubbers, which will displace clean well water. One of our Covanta facilities on Long Island has already received such a BUD and we have had preliminary discussions with the NYSDEC in which they have indicated support for the idea.

1e Describe the data collection process and data source(s) that you will use to measure progress towards this goal.

All of our on-site wells are equipped with flow meters, which are read and recorded daily. A report detailing water usage by month is submitted to the NYSDEC each year.

2a Are you proposing this as a Challenge Goal?

No

2b Does this goal address a significant aspect in your EMS?

Yes

Flexible Form Needed?	No	
	Baseline	Future
Exclude?	No	No
Reason for Exclusion	(IEc/Laurie) 7-23-08 Data is not excluded but next year need to determine if goal should be recategorized as material procurement. Review comments indicate that goal	

	may be better classified as material procurement - recycled content as they are procuring grey water to offset well water use.		
3a	Please provide information for these calendar years.	2007	2010
3b	What units are you using to quantify this indicator?	Gallons	
3c	List the baseline annual quantity of the indicator and the annual quantity you are committed to achieve by the future year. Assume a constant level of activity at your facility when setting your future goal.	416,821,000	411,821,000

- 4 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?

Normalized goal (i.e. indexed to level of business in baseline year)

- 5 Whether your goal is absolute or normalized, in your annual performance reports you will need to provide normalizing factors and normalized quantities of your annual data.

The normalizing factor is kilopounds of steam generated at the facility, which is directly proportional to the volume of water used.

- 6a. Are you subject to Federal, State, Tribal, or local regulatory requirements for this indicator?

Yes

- 6b. If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you.

The facility has a well permit issued by the NYSDEC that limits water usage to 520 million gallons per year.

- 6c. Your goal must exceed regulatory requirements. If applicable, explain how your goal exceeds the requirements.

Water usage in 2007 totaled 416.8 million gallons, which is well below the permit limit. An annual reduction of 5 million gallons would reduce usage even further below the limit.

Goal 3

1a Category Energy Use

1b Indicator Total (non-transportation) energy use

- 1c Does your goal include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific substance or component (e.g., ethane, cardboard)?

All

- 1d What activities or process changes do you plan to undertake at your facility to accomplish your goal e.g., technology changes in a particular process line, employee training?

The facility generates electricity from the combustion of MSW, uses about 10% of the power produced for in-house needs, and sells the remainder to the local utility. This goal is to reduce the amount of power used on site, which will be accomplished through energy efficiency improvements such as timers and motion

detectors on facility lights, motor circuit analysis on high energy using equipment, and potential use of solar and/or wind power.

- 1e Describe the data collection process and data source(s) that you will use to measure progress towards this goal.

The gross power produced by the facility and the net power sold to the utility are measured continuously and recorded daily. The difference is the power used on site, or in-house load.

- 2a Are you proposing this as a Challenge Goal?
No

- 2b Does this goal address a significant aspect in your EMS?
No

- 2c If neither, please explain why you believe this indicator should be included as a performance goal.

The facility is located on Long Island, NY, which has a limited power supply. As electrical demand increases with the growing population and expanded use of electronic equipment, energy efficiency becomes more and more important. By reducing our electrical usage on site, more power will be available for sale to the utility and use by the community.

- 3a Is the intent of your energy use goal to reduce total energy use, to use or invest in renewable energy fuel sources, or a combination of both?
Combination of Both Strategies

- 3b Please provide information for these calendar years.
Baseline: 2007 Future: 2010

Exclude? Yes Yes

Reason for Exclusion (IEC/Laurie) 7-23-08 - Data is excluded because WTE information appears incorrect. Need to followup next year to determine how much energy was used by the facility as they are only allowed to generate approx. 1.7 MMBtu and they report they only use 10% therefore their max energy use could only be 175,000 MMBtu. Also, need to calculate the emissions once the correct value is entered.

Flexible Form Needed?	No		
3c Off-site Sources			
<u>Electricity Purchased</u>	Baseline: 2007	Future: 2010	Units
Electricity from Grid/Utility			
Electricity from Off-Grid Renewable Sources			
Total Electricity Purchased	0.00	0.00	MMBtus
If your facility purchases electricity from the grid, please identify your facility's electricity geographic region.			

Steam			
Total Energy Generated Off-Site	0.00	0.00	MMBtus

3d	On-site Sources	Baseline: 2007	Future: 2010	Units
	Coal			
	Natural Gas			
	Crude Oil			
	Fuel Oil			
	Diesel			
	Propane/LPG			
	Gasoline			
	Hydrogen Powered Fuel Cells			
	Natural Gas / Methane Powered Fuel Cells			
	Biomass			
	Biodiesel			
	Solar			
	Wind			
	Landfill Gas			
	Geothermal			
	Hydroelectric			
	Tire Derived Fuel			
	Other Fuel or Source Specify: Municipal Solid Waste	902,000	884,000	MMBtus
	Total Energy Generated On-Site	902,000.00	884,000.00	MMBtus

3e	Total Energy Use and Associated Greenhouse Gas Emissions		
Total Renewable Energy Use	0.00	0.00	MMBtus
Total Non-Renewable Energy Use	0.00	0.00	MMBtus
Total Energy Use	902,000.00	884,000.00	MMBtus
Metric Tons of CO ₂ Equivalents	0.00	0.00	MTCO ₂ E
Metric Tons of CO ₂ Equivalents Offset due to Investments in Green Energy, e.g. green tags			MTCO ₂ E
Net Metric Tons of CO ₂ Equivalents	0.00	0.00	MTCO ₂ E

- 4 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?

Normalized goal (i.e. indexed to level of business in baseline year)

- 5 Whether your goal is absolute or normalized, in your annual performance reports you will need to provide normalizing factors and normalized quantities of your annual data.

The normalizing factor is kilopounds of steam generated at the facility, which is directly proportional to the energy needed to operate the facility.

- 6a. Are you subject to Federal, State, Tribal, or local regulatory requirements for this indicator?

No

Goal 4

- What category have you selected from the Environmental Performance Table?
- 1a Alternates Goal
- Please provide a short description of the environmental problem or issue that you propose to address.
- 2 Our facility will implement a chemical cleanout campaign at several schools within the Town of Hempstead, our host community.
- 3 Why is this an important environmental issue?
- As documented by EPA, schools use a variety of chemicals, which if mismanaged, could put students, school personnel and the environment at risk from spills, fires and accidental exposures.
- Please provide a description of the activities you intend to conduct.
- 4 We intend to work with schools to identify chemicals of concern, remove outdated and unused chemicals from the buildings, and ensure that these chemicals are properly disposed - either at our facility (if permitted) or at a licensed hazardous waste disposal facility.
- How do you plan on measuring the environmental benefit(s) of the project?
- 5 We will measure the environmental benefit of the project based on the volume and types of chemicals stored at the schools we work with. A baseline inventory will be conducted at the start of the program and a follow-up inventory will be completed in the middle of 2010 for comparison. We expect to see a reduction in overall inventory, as well as use of more environmentally friendly chemicals.
- 6 Summarize the milestones for the next three years, projected dates of milestones, and desired outcome/environmental benefit below.

Milestone	Project Date of Completion	Desired Outcome & Environmental Benefit	Measurable Improvement, if applicable
Partner with Town of Hempstead	7/31/08	Establish a partner to assist with outreach and disposal of unwanted chemicals	NA
Identify the target schools	9/30/08	Know our target audience	NA

Conduct a baseline chemical inventory at each of the schools and begin the education process	2/28/09	Establish baseline and provide education	NA
Removal and disposal of outdated and unused chemicals	8/31/09	Reduce risk of chemical exposure and potential environmental harm	Volume of chemicals removed and disposed
Follow-up inventory	8/31/10	Evaluation of effectiveness	Maintenance of reduced inventory
Complete additional outreach/training	12/31/08	Education (as needed)	NA
7 List any stakeholders or collaborators that you propose to work with on this project and indicate whether you've secured a goal from them.	We intend to work with the Town of Hempstead Department of Sanitation, which is already involved in a similar program, and some of the schools we have established relationships with through our annual recycling poster contest. We have not yet secured goals from these organizations.		

Section C Attachments (if applicable):

Section E: Self-Certification of Continued Program Participation

On behalf of Covanta Hempstead Company, I certify that:

- I have read and agree to the terms and conditions for Membership Renewal and Participation in the National Environmental Performance Track, as specified in the National Environmental Performance Track Program Guide and in the Renewal Application Instructions;
- I have personally examined and am familiar with the information contained in this Renewal Application. The information contained in this Renewal Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable Federal, State, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program

- My facility has conducted an objective assessment of its compliance with all Federal, State, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable Federal, State, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date: _____

Name: Mr. Kenneth Straitz
Title: Facility Manager
Facility Name: Covanta Hempstead Company
Facility Street Address: 600 Merchants Concourse
Westbury, NY 11590
Mailing Address:
Address cont:
City, State Zip: ,
Member ID#: A020052

Environmental Requirements Checklist

Facility Identification Information

1. Do you have a RCRA identification number?
(A RCRA number is used in the RCRAInfo database for Resource Conservation and Recovery Act (RCRA) programs).
Yes
RCRA ID: NYD980215511
- 2.

Do you have an AFS identification number?

(An AFS number is used in the AIRS Facility Subsystem of the Aerometric Information Retrieval System (AIRS) for Clean Air Act programs).

Yes

AFS ID: 3605900152

3. Do you have a PCS/NPDES identification number?

(A PCS/NPDES number is used in the Permit Compliance System (PCS) for Clean Water Act programs monitoring National Pollutant Discharge Elimination System (NPDES) permits).

No

4. Do you have a FIFRA identification number?

(A FIFRA number is given to facilities regulated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)).

No

5. If you want to provide more details or explanation for the questions above, use the box below.

NA

Air Characteristics

1. Is your facility an air permit holder?

Yes

a. Is your facility a Title V permit holder?

Yes

What is the permit number and date of issue?

Permit number: 1-2820-01727/00028

Date of issue: 11/24/04

b. Is your facility a Clean Air Act Synthetic Minor Source?

No

c. Is your facility a Clean Air Act Minor Source?

No

2. Is your facility subject to New Source Performance Standards (NSPS)?

Yes

List:

New Source Performance Standards (NSPS)

Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That Are Constructed on or Before September 26, 1994 (40 CFR 60 Subpart Cb)

3. Is your facility subject to Section 112/Maximum Achievable Control Technology (MACT) standards/National Emissions Standards for Hazardous Air Pollutants (NESHAPS)?
No
4. Is your facility subject to Reasonably Available Control Technology (RACT) requirements?
No
5. Is your facility subject to Section 129 combustion requirements?
Yes
6. List relevant state/local/tribal/other air requirements:
6 NYCRR Part 219-6: Existing Incinerators in New York City, Nassau and Westchester Counties

Water Characteristics

1. Is your facility a water permit holder?
Yes
 - a. Is your facility a National Pollutant Discharge Elimination System (NPDES) Permit Holder?
No
 - b. Is your facility subject to Phase I of the NPDES Storm Water Program?
No
 - c. Is your facility subject to Phase II of the NPDES Storm Water Program?
No
 - d. Is your facility a State Water Permit Holder?
Yes
2. Is your facility subject to industry specific effluent guidelines and standards?
No
3. Is your facility Required to Pretreat?
No
4. Is your facility regulated under the Safe Drinking Water Act?
No

5. List relevant state/local/tribal/other water requirements:

Water permit is for withdrawal from on-site groundwater wells. Facility is zero discharge for process water, but we have a sewer connection permit for emergency situations.

Hazardous Waste Characteristics

1. Is your facility subject to hazardous waste regulations?

Yes

a. Is your facility a Large Quantity Generator?

No

b. Is your facility a Small Quantity Generator?

No

c. Is your facility a Conditionally Exempt Small Quantity Generator?

Yes

d. Is your facility a Treatment, Storage, or Disposal (TSD) Facility?

No

2. List relevant state/local/tribal/other hazardous waste requirements:

NA

Environmental Clean-Up, Restoration, and Corrective Action Characteristics

1. Is your facility a Potentially Responsible Party under CERCLA or Superfund for onsite clean-up?

No

2. Is your facility a Potentially Responsible Party under CERCLA or Superfund for offsite clean-up?

No

3. Is your facility a Potentially Responsible Party in a federal or state clean-up of hazardous waste and/or oil?

No

4. Is your facility engaged in RCRA corrective action?

No

5.

List other relevant federal/state/tribal/local environmental clean-up, restoration, or corrective actions not listed above. Please include date(s) of any remedy decisions.

NA

Other Environmental Characteristics

1. Is your facility a Toxic Release Inventory (TRI) Reporter?
No
2. Is your facility subject to Underground Storage Tank (UST) Regulations?
No
3. Is your facility regulated under Toxic Substances Control Act (TSCA)?
No
4. Is your facility regulated under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)?
No
5. Is your facility subject to Worker Right-to-Know Regulations?
Yes
6. Is your facility required to file an emergency management plan under the Emergency Planning and Community Right-to-Know Act (EPCRA)?
No
7. List relevant state/local/tribal/other requirements:
6 NYCRR Part 360: Solid Waste Management Facilities